

# **C. Cotton Decl. Exhibit 16**



October 6, 2025

VIA ELECTRONIC MAIL

Christopher V. Cotton

Rachel B. Abrams  
Peiffer Wolf Carr Kane Conway & Wise, LLP  
555 Montgomery Street, Suite 820  
San Francisco, CA 94111  
rabrams@peifferwolf.com

2555 Grand Blvd.  
Kansas City, Missouri 64108  
t 816.474.6550  
dd 816.559.2393  
f 816.421.5547  
ccotton@shb.com

Donald D. Grubbs  
Pulaski Kherkher, PLLC  
2925 Richmond Ave. #1725  
Houston, TX 77098  
dgrubbs@pulaskilawfirm.com

Dennis C. Reich, ESQ.  
Reich and Binstock, LLP  
4265 San Felipe, Suite 1000  
Houston, Texas 77027  
dreich@reichandbinstock.com

Re: *In re: Uber Technologies, Inc.*, No. 3:23-md-03084-CRB (N.D. Cal.)

Counsel:

I write to initiate a meet and confer regarding Plaintiffs listed in **Attachment 1**. PTO #5 requires each Plaintiff to "submit a bona fide ride receipt" from an Uber trip connected to the alleged incident. PTO #5, ¶ 4 (ECF 175). The listed Plaintiffs have violated PTO #5 and have not provided a bona fide receipt. It is Defendants' position that these cases should be dismissed with prejudice.

I have included all law firms representing Plaintiffs on Attachment 1 on this communication, as well as Plaintiffs' MDL leadership in the transmittal. Given the fast-moving nature of this docket and impending trials in this matter, it is imperative that we meet and confer on these issues promptly this week. I can make myself available most times this week to accommodate the group's schedules. Please provide your availability to meet and confer this week.

**SHOOK**  
HARDY & BACON

Best regards,



Christopher V. Cotton  
Partner

**ATTACHMENT 1**

1. 3666 – Pulaski Law Firm, PLLC
2. 3699 – Pulaski Law Firm, PLLC
3. 3787 – Pulaski Law Firm, PLLC
4. 3877 – Reich and Binstock, LLP
5. 3921 – Peiffer Wolf Carr Kane Conway & Wise
6. 3962 – Reich and Binstock, LLP
7. 3977 – Reich and Binstock, LLP